

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

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| iRACING.COM MOTORSPORT SIMULATIONS LLC, |) | |
| a Delaware Limited Liability Company, Plaintiff |) | |
| |) | |
| V. |) | Civil Action No. |
| |) | 05-11639 NG |
| TIM ROBINSON, individually and d/b/a |) | |
| www.ow-racing.com and www.torn8oalley.com , |) | |
| Defendant |) | |

DEFENDANT'S MOTION TO EXTEND TIME FOR COMPLYING WITH
THE COURT'S ORDER COMPELLING DISCOVERY

Counsel for the defendant Tim Robinson moves that the time within which defendant may comply with the Court's Order Compelling Discovery be extended to and including Monday, June 12, 2006. In support of this motion the undersigned counsel respectfully represents as follows:

1. Upon information and belief, the defendant Tim Robinson has been traveling on business most of the time since the Court entered its Order Compelling Discovery.
2. As a result, the undersigned counsel has been unable to confer at any great length with the defendant Tim Robinson since the Court entered its Order Compelling Discovery.
3. Upon information and belief, the defendant Tim Robinson is traveling on business again this week.
4. The undersigned counsel also is traveling this week, leaving for New Jersey today, for a previously postponed status conference in the United States District Court for the District of New Jersey tomorrow, and for multi-party depositions tomorrow afternoon and Thursday, June 1, 2006 and possibly into Friday, June 2, 2006.

WHEREFORE the defendant Tim Robinson respectfully requests that the time within which defendant may comply with the Court's Order Compelling Discovery be extended to and including Monday, June 12, 2006.

By his attorneys,

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Certificate

I certify that I attempted to confer with counsel for plaintiff concerning this motion, by emailing a copy thereof at 10:13 a.m. both to Attorney Irwin Schwartz and Michael Andrews with a request that they advise as to whether or not they would assent; but neither attorney has acknowledge receipt of the email as of this time, 12:35 p.m.
